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DATE FILED: 11/14/14

Attorneys for Plaintiffs NIKE, Inc. and Converse Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NIKE, INC. and CONVERSE INC.,

Plaintiffs,

٧.

MARIA WU d/b/a WWW.SHOECAPSXYZ.COM; LINHAI KE d/b/a WWW.SHOECAPSXYZ.COM; STOREONLINESERVICE2012@GMAIL.COM d/b/a WWW.FREERUNONLOCKER.CO.UK; SERVICE2@AIREMAIL.NET d/b/a WWW.FOOTWEARSUPER.CO.UK; LIN ZOE d/b/a WWW.WHOLESALENFLJERSEYSSALE.COM; COMMINUTETE MORE K.K. d/b/a WWW.WHOLESALENFLJERSEYSSALE.COM; BRAKEHEMALT K.K. d/b/a WWW.NFLOFCHINA.COM and WWW.STOREONLINESELLLNOW.COM; et al.

Defendants.

2013 Civ. 8012 (SAR)

[PROPOSED] TEMPORARY RESTRAINING ORDER, ORDER TO DISABLE CERTAIN WEBSITES, ASSET RESTRAINING ORDER, ORDER AUTHORIZING EXPEDITED DISCOVERY AND ALTERNATIVE SERVICE BY ELECTRONIC MAIL, AND ORDER TO SHOW CAUSE FOR PRELIMINARY INJUNCTION

Plaintiffs NIKE, Inc. ("NIKE") and Converse Inc. ("Converse") (collectively,

"Plaintiffs"), having moved ex parte against Defendants Maria Wu d/b/a

www.shoecapsxyz.com; Linhai Ke d/b/a www.shoecapsxyz.com;

storeonlineservice2012@gmail.com d/b/a www.freerunonlocker.co.uk; service2@airemail.net

d/b/a www.footwearsuper.co.uk; Lin Zoe d/b/a www.wholesalenfljerseyssale.com; Comminutete More K.K. d/b/a www.wholesalenfljerseyssale.com; Brakehemalt K.K. d/b/a www.nflofchina.com and www.storeonlineselllnow.com; customerserviceNol@hotmail.com d/b/a www.dsmrecap.com; secureonlinepay@hotmail.com d/b/a www.soccerumarket.com; service3@linkonlinemail.com d/b/a www.d3classicshoes.co.nz; service1@webseemial.com d/b/a www.aflshox.com; Bodon Trading d/b/a www.cheapkd5shoes.com and www.freesrunsstore.com; Eric Lee d/b/a www.cheapkd5shoes.com; Meijin Huang d/b/a www.cheapkd5shoes.com; Zhizhen Li d/b/a www.freesrunsstore.com; Cheap Nike Free Run Trade Co. Ltd. d/b/a www.nikefree4s.com; service@nikefreeruns30.com d/b/a www.nikefreeruns30.com; nikefreeonline2012@hotmail.com d/b/a www.freebuyshoes.com and www.newfreeshoes.com; Chen Jinxing d/b/a www.buywikionline.com; lindajerseys@gmail.com d/b/a www.lindajersevs.com and www.linda-jerseys.com; University Jhug Limited d/b/a www.yes-shoe.com and www.yes-shoe.net; Zheng Jiangyang d/b/a www.greatwholesalejersyes.net; Extentbargain K.K. d/b/a www.for-jerseys.biz and www.myspeto.com; bbbpppkkk@yahoo.com d/b/a www.nikefreeruns-factory.com; Bi Ning Zhuo d/b/a www.freerunlinea.com; Jiang Lili d/b/a www.cheapnikeairmax-mart.com; customerservice.LY@gmail.com d/b/a www.airmaxofficialshop.co.uk and www.airmax90uksales.co.uk; service@kickslion.com d/b/a www.kickslion.net; Kendrickvery PT d/b/a www.oykununsesi.com and www.payfororder.com; wholesalejerseyscenter@gmail.com d/b/a www.nfljersevswebsite.com; Meion Online Store d/b/a www.buyrealcheapjordans.com and www.fashionpay.com; lessspam42@gmail.com d/b/a www.authentic-jordans.us; Jinhui Zheng d/b/a www.shopuq.com; Zheng Jinzhao d/b/a www.shopuq.com; sneakers2013@gmail.com d/b/a www.max-2013.com; nikefair@msn.com d/b/a www.cheapestlebron10.com; hotairjordan13@gmail.com d/b/a www.hotairjordan13.com; Shan Peter d/b/a www.cheapukniketrainers.co.uk; ABC Companies 1-100; and John Does 1-100 (collectively, with the individuals and entities identified in Attachment 1, "Defendants") for a temporary restraining order, asset restraining order, order authorizing expedited discovery and alternative service of process by electronic mail, and order to show cause for preliminary injunction pursuant to Federal Rule of Civil Procedure 65 and the Lanham Act (15 U.S.C. § 1051, et seq.), for the reason that Defendants are manufacturing, importing, exporting, distributing, marketing, advertising, offering for sale and/or selling goods bearing counterfeit reproductions of Plaintiffs' federally registered trademarks, trade names, and/or logos as set forth in Plaintiffs' Complaint in this action (collectively, "Plaintiffs' Marks"), which are owned and controlled by Plaintiffs, and the Court, having reviewed the Complaint, Memorandum of Law, supporting Declarations and exhibits submitted therewith, finds:

- a. Plaintiffs have established that they are entitled to injunctive relief by demonstrating that (1) they are likely to succeed on the merits of their claims; (2) they are suffering irreparable injury and, in the absence of an injunction, will continue to suffer irreparable injury, based on Defendants' unauthorized use and infringement of Plaintiffs' Marks in connection with the manufacture, importation, exportation, distribution, marketing, advertising, offer for sale and/or sale of various products, including but not limited to footwear, clothing, and accessories for men, women and children (the "Counterfeit Products"); (3) remedies at law, such as money damages, are inadequate to compensate for Plaintiffs' injuries; (4) the balance of hardships favors Plaintiffs; and (5) granting Plaintiffs' request for injunctive relief would serve the public interest;
- b. Plaintiffs have demonstrated that they are likely to succeed in showing that the Plaintiffs' Marks are valid and enforceable, and entitled to protection, and that Defendants'

willful and unlawful use of the Plaintiffs' Marks in connection with the sale of Counterfeit Products is likely to cause consumer confusion;

- c. Plaintiffs have demonstrated that they are likely to succeed in showing that

 Defendants have used and are continuing to use counterfeits or infringements of the Plaintiffs'

 Marks in connection with the manufacture, exportation, importation, distribution, marketing,
 advertising, offer for sale and/or sale of Counterfeit Products;
- d. Plaintiffs have demonstrated that they are likely to succeed in showing that Defendants are, or were within the last twelve months, selling Counterfeit Products through the use of hundreds of websites (collectively, the "Infringing Websites"). including, without limitation, the websites detected to date by Plaintiffs, which are or were located at the domain names set forth in Attachment 1;
- e. Plaintiffs have demonstrated that they are likely to succeed in showing that

 Defendants have registered and are continuing to register domain names that are identical to, or
 confusingly similar to, one or more of the Plaintiffs' Marks (collectively, the "Infringing

 Domain Names"), in violation of the Anticybersquatting Consumer Protection Act, 15 U.S.C.

 § 1125(d), including, without limitation, the Infringing Domain Names detected to date by the

 Plaintiffs, which are set forth in Attachment 2;
- f. Plaintiffs have demonstrated that they are likely to succeed in showing that

 Defendants have a bad faith intent to profit by associating themselves with Plaintiffs and the

 Plaintiffs' Marks without Plaintiffs' authorization;
- g. Plaintiffs have demonstrated that Defendants have gone to great lengths to conceal themselves and their ill-gotten proceeds from Plaintiffs and this Court's detection, including by providing intentionally-deceptive contact information and using multiple false identities and addresses associated with their operations;

- h. Plaintiffs have demonstrated that Defendants, or other persons acting in concert with Defendants, would likely destroy, move, hide, or otherwise make the Counterfeit Products, Defendants' means of selling and distributing the Counterfeit Products, financial accounts used in connection with the sale of Counterfeit Products, records relating to the ultimate disposition of Defendants' ill-gotten proceeds, and business records relating thereto, inaccessible to Plaintiffs or the Court if Plaintiffs were to proceed on notice to the Defendants, thus frustrating the ultimate relief that Plaintiffs seek in this action;
- i. Plaintiffs have demonstrated that the harm to Plaintiffs from denial of the requested *ex parte* order outweighs the harm to Defendants' legitimate interests against granting such an order:
- j. Plaintiffs have demonstrated that the entry of an order other than the *ex parte* order would not adequately achieve the purposes of the Lanham Act to preserve Plaintiffs' remedies for trademark counterfeiting, including, *inter alia*, the cessation of all sales of the Counterfeit Products, the acquisition of the business records relating to the Counterfeit Products, and Plaintiffs' rights to an equitable accounting of Defendants' profits, lost profits, or damages.

THEREFORE, the Court finds it appropriate to grant Plaintiffs the following relief as detailed further below:

- (I) Order to Show Cause Preliminary Injunction;
- (II) Temporary Restraining Order:
- (III) Asset Restraining Order;
- (IV) Order Authorizing Alternative Service by Electronic Means; and
- (V) Order Authorizing Expedited Discovery from Defendants and Third Parties;
- (VI) Order to Suspend Defendants' Infringing Websites; and
- (VII) Prohibition against Aiding and Abetting Violations of this Order by Third Parties.

I. ORDER TO SHOW CAUSE – PRELIMINARY INJUNCTION

- 1. IT IS HEREBY ORDERED that Defendants appear to show cause on the 27th day of November 2013 at 10:30 (a.m/p.m. or as soon thereafter as counsel can be heard, in Courtroom 15C of the United States District Court for the Southern District of New York at 500 Pearl Street / 40 Foley Square, New York, New York why an order pursuant to Rule 65 of the Federal Rules of Civil Procedure and Section 34 of the Lanham Act should not be entered granting Plaintiffs a preliminary injunction as follows:
- 2. Restraining and enjoining Defendants, their officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them from:
 - a. using Plaintiffs' Marks, or any reproduction, counterfeit, copy, or colorable imitation of Plaintiffs' Marks, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks, in connection with manufacturing, distributing, delivering, shipping, importing, exporting, advertising, marketing, promoting, selling or offering for sale Counterfeit Products or any other products confusingly similar to Plaintiffs' Products, or that otherwise bear, contain, display, or utilize any of the Plaintiffs' Marks;
 - making or employing any other commercial use of the Plaintiffs' Marks, any
 derivation or colorable imitation thereof, or any mark confusingly similar thereto
 or likely to dilute or detract from the Plaintiffs' Marks;
 - c. using any other false designation of origin or false description or representation or any other thing calculated or likely to cause confusion or mistake in the mind of the trade or public or to deceive the trade or public into believing that Defendants'

- products or activities are in any way sponsored, licensed or authorized by or affiliated or connected with Plaintiffs;
- d. using or transferring ownership of the Infringing Websites or Infringing Domain Names, or registering or using any other domain names incorporating, in whole or in part, any word or mark identical or similar to the name NIKE or Converse or otherwise making use of the Plaintiffs' Marks;
- e. doing any other acts or things calculated or likely to cause confusion or mistake in the mind of the public or to lead purchasers or consumers or investors to believe that the products or services promoted, offered, or sponsored by Defendants come from Plaintiffs' or their licensees, or are somehow licensed, sponsored, endorsed, or authorized by, or otherwise affiliated or connected with Plaintiffs;
- f. moving, returning, destroying, secreting, or otherwise disposing of any

 Counterfeit Products or any products that otherwise bear, contain, display, or

 utilize any of the Plaintiffs' Marks, any derivation or colorable imitation thereof,

 or any mark confusingly similar thereto or likely to dilute or detract from the

 Plaintiffs' Marks;
- g. removing, destroying, altering, secreting, or otherwise disposing of any computer files, electronic files or data, business records, or documents containing any information relating to any of the Infringing Websites, Defendants' assets or operations, or to the importing, manufacturing, production, marketing, advertising, promoting, acquisition, purchase, distribution or sale of Counterfeit Products or any products that otherwise bear contain, display, or utilize any of the Plaintiffs' Marks, any derivation or colorable imitation thereof, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks;

- h. further diluting and infringing the Plaintiffs' Marks and damaging Plaintiffs' goodwill;
- i. otherwise competing unfairly with Plaintiffs or any of their authorized licensees in any manner; and
- j. assisting, aiding, or abetting any other person or business entity in engaging in or performing any of the activities referred to in the above subparagraphs (a) through (i), or effecting any assignments or transfers, forming new entities or associations, or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in subparagraphs (a) through (i).
- 3. Restraining and enjoining Defendants, their officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them from transferring, disposing of, or secreting any of Defendants' assets, as set forth further herein; and
- 4. Restraining Defendants, their officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them from accessing the Infringing Websites for the duration of this action, as set forth further herein.

6. IT IS FURTHER ORDERED, that Defendants are hereby given notice that failure to attend the hearing scheduled herein may result in confirmation of the relief provided herein. immediate issuance of the requested preliminary injunction to take effect immediately upon expiration or dissolution of the temporary restraining order, and may otherwise extend for the pendency of this litigation upon the same terms and conditions as comprise this temporary restraining order. Defendants are hereby given further notice that they may be deemed to have actual notice of the issuance and terms of such preliminary injunction and any act by them or anyone of them in violation of any of the terms thereof may be considered and prosecuted as contempt of this Court.

II. TEMPORARY RESTRAINING ORDER

IT APPEARING to the Court that Defendants are manufacturing, exporting, importing, distributing, marketing, advertising, offering for sale, and/or selling the Counterfeit Products, including via the Infringing Websites, and that Defendants will continue to carry out such acts unless restrained by Order of the Court:

- 7. IT IS FURTHER ORDERED that pending the hearing on Plaintiffs' application for a preliminary injunction, Defendants, their officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them, or having knowledge of this Order by personal service or otherwise, are hereby temporarily restrained from committing any of the acts set forth in Paragraphs 2 4 above, and as set forth further herein.
- 8. IT IS FURTHER ORDERED that the Temporary Restraining Order shall remain in effect until the date for the hearing on the Order to Show Cause, as set forth above, or such further dates as set by the Court.

- 9. IT IS FURTHER ORDERED that, upon a showing that Defendants are continuing to sell Counterfeit Products on newly-detected Infringing Websites ("Newly-Detected Infringing Websites"), the Plaintiffs may move to amend this Order to extend the application of the relief granted herein to the Newly-Detected Infringing Websites.
- 10. IT IS FURTHER ORDERED that Plaintiffs shall post a corporate surety bond, cash, certified check, or attorney's check in the amount of ten thousand dollars (\$10,000) as security, determined adequate for the payment of such damages as any person may be entitled to recover as a result of a wrongful restraint hereunder.

III. ASSET RESTRAINING ORDER

- Rules of Civil Procedure, 15 U.S.C. § 1116(a), and this Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, Defendants, their officers, directors, agents, representatives, successors or assigns, and all persons acting in concert or in participation with any of them, including any third parties receiving actual notice of this Order by personal service or otherwise, are temporarily restrained and enjoined from transferring, withdrawing or disposing of any money or other assets into or out of any accounts held by, associated with, or utilized by Defendants, regardless of whether such money or assets are held in the U.S. or abroad.
- 12. The provisions of this section apply to any and all money or assets, whether held in the U.S. or abroad, including but not limited to any money or assets held with:

 (a) PayPal, Inc., including but not limited to PayPal accounts account associated with the email addresses: onlinebizdiscount@gmail.com, j3e42d@outlook.com, lyleqet@hotmail.com, janespanich@hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in hotmail.com, and any other email addresses listed in <a href="https://doi.or

Zhao (account number: 621 6666 4000 0082 7447) and Defendant Zheng Jinzhao (account number 455 2308 0188 0045 787); (c) Western Union; (d)MoneyGram; (e) MasterCard, Visa, American Express and/or Discover; (f) Payitrust Co., Ltd.; (g) Realpay; (h) Moneybrace; (i) Vimapay Co., Ltd.; (j) Pmnorth; (k) Promptlypayments; (l) Wedopay; (m) ECPSS; and (n) GlbPay.

13. IT IS FURTHER ORDERED that upon two (2) business days' written notice to the Court and Plaintiffs' counsel, any Defendant or affected third party may, upon proper showing, appear and move for dissolution or modification of the provisions of this Order.

IV. ORDER AUTHORIZING ALTERNATIVE SERVICE BY ELECTRONIC MEANS

14. IT IS FURTHER ORDERED that, sufficient cause having been shown, Plaintiffs' motion for alternative service by electronic means is granted, and service shall be made on Defendants and deemed effective as to all Defendants if it is completed by delivery of Adobe PDF copies of this Order together with the Summons and Complaint to the email addresses set forth in Attachment 3. Such service shall be made within ten (10) days from the date of this Order, except as to John Doe or ABC Company Defendants who may be later identified.

V. ORDER AUTHORIZING EXPEDITED DISCOVERY

- 15. IT IS FURTHER ORDERED that Plaintiffs' motion to obtain expedited discovery from Defendants, their officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them, is granted, and that Plaintiffs shall serve with this Order the requests for disclosures pursuant to Fed. R. Civ. P. 26 and Fed. R. Civ. P. 34 appended hereto as <u>Attachment 4</u>, and that Defendants shall produce all documents responsive to such requests on or before the <u>fix</u> day of <u>December</u>, 2013; and
- 16. IT IS FURTHER ORDERED that, as set forth below, Plaintiffs' motion to obtain expedited discovery from third parties is granted.

A. Provisions Applicable to Third Party Financial Service Providers

- by providing actual notice of this Order to any banks, savings and loan associations, payment processors or other financial institutions, merchant account providers, payment providers, third party processors, or credit card associations, which have provided services, received payment, or held assets for any Defendant, any of Defendant's operations, any of the Infringing Websites, or for any other website owned or controlled by any Defendant, including without limitation, PayPal, Bank of China, Western Union, MoneyGram, MasterCard, Visa, American Express, Discover, Payitrust Co., Ltd., Realpay, Moneybrace, Vimapay Co., Ltd., Pmnorth, Promptlypayments, Wedopay, ECPSS, and GlbPay (collectively, "Third Party Financial Service Providers"); and
- 18. IT IS FURTHER ORDERED that, within ten (10) days of receiving actual notice of this Order by personal service or otherwise, all Third Party Financial Service Providers must provide to Plaintiffs' counsel all documents and records in their possession, custody or control, whether located in the U.S. or abroad, relating to any financial accounts (including but not limited to any savings, checking, money market, or payment processing accounts) held by, associated with, or utilized the Defendants, their officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them. This includes all documents and records relating to:
 - a. Defendants' Infringing Websites and any other websites registered by Defendants, including the identities of the individuals or entities that registered and operated the Infringing Websites;
 - b. the manufacturing, exporting, importing, distributing, marketing, advertising, offering for sale, and/or selling of Counterfeit Products by Defendants, their

- officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them;
- c. the identities of any and all credit card processing agencies, merchant acquiring banks, or other financial institutions responsible for processing credit card, debit card, or other forms of financial transactions for the Infringing Websites;
- d. the identities and addresses of Defendants, their officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them, including without limitation, identifying information associated with Defendants' Infringing Websites;
- e. payments made to or by Defendants in exchange for goods or services provided by or to Defendants, including information sufficient to identify the recipient and beneficiary of such payment;
- f. identifying information, including full account numbers;
- g. account opening documents, including account applications, signature cards, copies of identification documents provided and, if a business account, copies of any corporate resolution to open account and other business documents provided which may include articles of incorporation for the business;
- h. all deposits and withdrawals and any supporting documentation, including deposit slips, withdrawal slips, cancelled checks (both sides), and periodic account statements;
- i. all wire transfers into the financial accounts, including documents sufficient to identify the source of transferred funds, such as documents reflecting the name of bank or entity from which the funds originated, the account number from which

- the funds were transferred, and the name of the person or entity from whose account such funds were transferred; and
- j. all wire transfers out of the financial accounts, including documents sufficient to identify the destination of the transferred funds, such as documents reflecting the name of the beneficiary of such transfer, the identity of the beneficiary's bank, and the beneficiary's full account number.

B. Provisions Applicable to Third Party Website Service Providers

- by providing actual notice of this Order to any Internet service providers ("ISPs"), back-end service providers, website designers, sponsored search engine ad-word providers, shippers, domain name registrars, domain name registries, domain protection services, or any other business supporting, hosting or providing e-commerce services to any Defendant, any of Defendants' Infringing Websites, or for any other website owned or controlled by any Defendant (collectively, "Third Party Website Service Providers"); and
- 20. IT IS FURTHER ORDERED that, within ten (10) days of receiving actual notice of this Order by personal service or otherwise, all Third Party Website Service Providers must provide to Plaintiffs' counsel all documents and records in their possession, custody or control, whether located in the U.S. or abroad, relating to:
 - a. Defendants' Infringing Websites and any other websites registered by Defendants, including the identities of the individuals or entities that registered and operated the Infringing Websites;
 - b. the manufacturing, exporting, importing, distributing, marketing, advertising, offering for sale, and/or selling of Counterfeit Products by Defendants, their

- officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them;
- c. the identities and addresses of Defendants, their officers, directors, agents, employees, representatives, successors or assigns, and all persons acting in concert or in participation with any of them, including without limitation, identifying information associated with Defendants' Infringing Websites; and
- d. payments made to or by Defendants in exchange for goods or services provided by or to Defendants, including information sufficient to identify the recipient and beneficiary of such payment.

C. Provisions Applicable to All Other Third Party Service Providers

- 21. IT IS FURTHER ORDERED that Plaintiff may immediately request discovery by providing actual notice of this Order along with a subpoena, pursuant to Fed. R. Civ. P. 45, to any other third party service providers that have provided services for any Defendant, any of Defendants' Infringing Websites, or for any other website owned or controlled by any Defendant (collectively "Other Third Party Service Providers").
- 22. IT IS FURTHER ORDERED that, pursuant to this Court's authority under Rules 1, 26, and 34 of the Federal Rules of Civil Procedure and this Court's own inherent authority, plaintiffs may also serve subpoenas for the production of documents, electronically stored information, or tangible things similar to those allowed in the preceding paragraphs of this Order on an expedited basis pursuant to this Order, and that within ten (10) days of receiving actual notice of this Order and being served with a subpoena pursuant to this Order, all Other Third Party Service Providers who receive such subpoena must either provide to Plaintiffs' counsel all responsive documents and records in their possession, custody or control, whether

located in the U.S. or abroad, or else seek relief from this Court from the obligations created by this Order.

VI. ORDER TO SUSPEND DEFENDANTS' INFRINGING WEBSITES

- domain name registry, including but not limited to VeriSign, Inc., Neustar, Inc., Afilias Limited, Nominet UK, the Public Interest Registry, and/or an individual registrar holding or listing one or more domain names used in conjunction with Defendants' Infringing Websites, including those set forth in Attachment 1, shall, within three (3) business days of receiving actual notice of this Order by personal service or otherwise, temporarily disable these domain names, through a registry hold or otherwise, and make them inactive and untransferable until further order from this Court. Notwithstanding the preceding sentence, the terms of this Paragraph shall have no application if a domain name has already been disabled and/or the ownership of such domain name has been transferred by the registry or registrar pursuant to a court order issued in another litigation (e.g., Nat'l Football League, et al., v. Sunmei, et al., 13 Civ. 2572 (LGS) (S.D.N.Y.)).
- 24. IT IS FURTHER ORDERED, pursuant to Fed. R. Civ. P. 65(d)(2), that any Third Party Website Service Providers, including but not limited to domain privacy services (e.g., WhoIsGuard.com and PrivacyProtect.org), shall, within three (3) business days of receiving actual notice of this Order by personal service or otherwise, temporarily disable all services provided to any and all of Defendants' Infringing Websites until further order from this Court.

VII. PROHIBITION AGAINST AIDING AND ABETTING VIOLATIONS OF THIS ORDER BY THIRD PARTIES

25. IT IS FURTHER ORDERED, by automatic operation of Fed. R. Civ. P. 65(d)(2), that all third parties who act in active concert or participation with Defendants and who receive actual notice of this Order by personal service or otherwise shall be bound by the terms of this

Order and are prohibited from assisting in any violation of this Order, including, without limitation:

- a. permitting the transfer, withdrawal or disposal of any money or other assets by Defendants, their officers, directors, agents, representatives, successors or assigns, and all persons acting in concert or in participation with any of them, into or out of any accounts held by, associated with or utilized by any of the Defendants, regardless of whether such money or assets are held in the U.S. or abroad;
- b. permitting the advertising, promoting, or marketing of Defendants' Counterfeit
 Products or the Infringing Websites, or the sale or distribution of Counterfeit
 Products by Defendants, their officers, directors, agents, representatives,
 successors or assigns, and all persons acting in concert or in participation with any of them; and
- c. supporting, hosting or providing e-commerce services Defendants` Infringing
 Websites, including continuing to connect customers to the Infringing Websites.
- 26. IT IS FURTHER ORDERED that any third party that has received proper notice of this Order pursuant to Fed. R. Civ. P. 65(d)(2), and requires clarifications as to its duties, if any, under this Order, may make an application to this Court, with notice to Plaintiffs' counsel.

IT IS SO ORDERED.

DATED this A day of MOV, 2013

Hour: ________a.m./p.m.

UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT JUDGE

ATTACHMENT 1

(INFRINGING WEBSITES)

		INFRINGING WE DEFENDANTS - GR	The second secon	
	Domain Name	Name(s)	Email Address(es)	Affected Plaintiff (Nike and/or Converse
1	www.vans2010-tw.com	WHOIS AGENT	domainadm@hichina com	Nike
2	www.nikeo78.com	DOMAIN WHOIS PROTECTION SERVICE	roro3314@hotmail.com	Nike
			nike88888com@hounail.com	
			shopping8090@hotmail.com	Í
			nike9a@yahoo.cn	
			shopping8090@yahoo en	
			www.51nikecom@yahoo cn	
			vanuolv@yahoo.com tw	
			gucci591@yahoo com tw	
;	www.visvim-taipei.com	WHOIS AGENT	domainadm@hichina.com	Nike
,	www.vi3siin-taiper.com	WHOIS MOERT	shopping 112233 @hotmail.com	. TIRE
			shopping 112233 @yahoo.com.tw	
1	www.vans88-tw.com	car cigur	vanuolv2013@163.com	Nike
•			violet.min@hotmail.com	
			shopping 112233@hotmail.com	
			shopping112233@yahoo com tw	Į.
5	www.levis523.com	Pan Bing Huang	1749080296@jqq.com	Nike
			violet min@hotmail.com	, , , , ,
			shopping8090@hotmail.com	
			shopping 12233@hotmail.com	
			shopping8090@yahoo.com.tw	
	127 A. Lee	D- P- (f	shopping112233@yahoo com tw	
)	www.123shoeshop.com	Pan Bing Huang	makemoney 888@hotmail.com	Nike
	}		shopping8090@hotmail.com	
		(shopping112233@hotmail.com	
			shopping8090@yahoo.com.tw	1
			shopping112233@yahoo.com.tw	
7	www.camper-taiwan.com	WHOIS AGENT	domainadm@hichina.com	Nike
			violet.min@hotmail.com	1
	1		shopping8090@hotmail.com	
	(shopping 112233@hotmail.com	
	1		shopping8090@yahoo com.tw	
			shopping 112233@yahoo com.tw	
B	www freerunners-tn-au com	pu tian shi qing chun mao yi you xian gong si	shoesspring@hotmail.com	Nike
9	www.shoes-bags-china.info	sanchun wu	530267919@qq.com	Nike
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	Domain Name	Name(s)	Email Address(es)	Affected Plaintiff
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270	www.picjordaar-s com	Marik Gavis	servicemaxairjordan@gmail.com	, TIRE
207	www.globaljordanforsale.com	GoDaddy	gilmercbqwwf@hotmail.com	Nike
39!	www grobarjordaniorsare com	Godaddy	guinercod www.anounan.com	INIKE
	<u> </u>	DESCRIPTION OF COLUMN	TIP VI	
		DEFENDANTS - GRO		
	Domain Name	Name(3)	Email Address(es)	Affected Plaintiff
				(Nike and/or Converse)
398	www authentic-jordans.us	Tim RhudY	colepenam@gmail.com	Nike
		WWW CLOTHING NET GUANGZHOU	lessspam42@gmail.com	
399	www.cheapjordan1lbred.org	Tim RhudY	colepenam@gmail.com	Nike
		DEFENDANTS - GRO	OUP V	
	Domain Name	Name(s)	Email Address(es)	Affected Plaintiff
				(Nike and/or Converse)
400	www.cheaptd.com	zheng jinhui	topbrand-ol@hotmail.com	Nike
			inttopshop@hotmail.com	
			inttopshop1@hotmail.com	
401			inttopshop@yahoo cn	N. 1.
401	www shopuq.com	jinhui zheng	topbrand-ol@hotmail.com	Nike
		Anne Zheng	inttopshop@hotmail.com	Converse
	1	Zheng Jinzhao	inttopshop!@hotmail.com	
		Jinhui Zheng	inttopshop@yahoo.cn	
402	www echeapmk com	zheng jinhui	topbrand-ol@hotmail.com	Nike
			inttopshop@hotmail.com	
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	Domain Name	Name(s)	Email Address(es)	Affected Plaintiff
	20111213	1,000,0121		(Nike and/or Converse)
403	www.airmax2013box.com	Join Lin	linjian891022@gmail.com	Nike and converse
403	www.armaxzorsoox.com	Jour Cu.	sale@airmax2013box.com	INIKE
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404	www airmaxhyperfuse2013 com	Join Lin	linjian891022@gmail.com	Nike
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405 406 407 408 409 410 411 412 413 416 417 411	www max-2013 com www jordanshoesinthebox com www jordan11bredbox.com www lebron10fans com www 378037-010 com www bred-11 com www offerjordan4 com www redjordan11 com www new2013airmax com www womensjordan3 com www womensjordan3 com www highdunkshoes com Domain Name www billigenikefrees com www cheapestlebron10 com	Join Lin Join Lin Peur Junck Nian Hua Nian Hua Nian Hua Nian Hua Fanskel Lemuel Join Lin Fanskel Lemuel shinsaku Drock DEFENDANTS - GR Name(s)	sneakers2013@gmail.com linjian891022@gmail.com sneakers2013@gmail.com linjian891022@gmail.com nikesneakersaler@gmail.com nikesneakersaler@gmail.com nianhua.t@gmail.com nianhua.t@gmail.com nianhua.t@gmail.com nianhua.t@gmail.com nianhua.t@gmail.com nianhua.t@gmail.com nianhua.t@gmail.com sneakers2013@gmail.com nianhua.t@gmail.com sneakers2013@gmail.com nianhua.t@gmail.com sneakers2013@gmail.com	Nike Nike Nike Nike Nike Nike Nike Nike
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405 406 407 408 410 411 412 413 414 416 417	www max-2013 com www.jordan11bredbox.com www.jordan11bredbox.com www.jordan11bredbox.com www.jordan11bredbox.com www.jordan11bredbox.com www.jordan11com www.offerjordan4com www.offerjordan4com www.new2013airmax.com www.new2013airmax.com www.womensjordan3.com www.womensjordan3.com www.highdunkshoes.com Domain.Name www.billigenikefrees.com www.cheapsfoamposite.com	Join Lin Join Lin Peur Junck Nian Hua Nian Hua Nian Hua Nian Hua Nian Hua Fanskel Lemuel Join Lin Fanskel Lemuel shinsaku Drock DEFENDANTS - GR Name(s) zhou kai zhou kai	sneakers2013@gmail.com linjian891022@gmail.com sneakers2013@gmail.com linjian891022@gmail.com nikesneakersaler@gmail.com nikesneakersaler@gmail.com nikesneakersaler@gmail.com nianhua.t@gmail.com sneakers2013@gmail.com	Nike Nike Nike Nike Nike Nike Nike Nike
405 406 407 408 410 411 412 413 414 416 417	www max-2013 com www jordanshoesinthebox com www jordan11bredbox.com www lebron10fans com www 378037-010 com www bred-11 com www offerjordan4 com www redjordan11 com www new2013airmax com www womensjordan3 com www womensjordan3 com www highdunkshoes com Domain Name www billigenikefrees com www cheapestlebron10 com	Join Lin Join Lin Peur Junck Nian Hua Nian Hua Nian Hua Nian Hua Nian Hua Fanskel Lemuel Join Lin Fanskel Lemuel shinsaku Drock DEFENDANTS - GR Name(s) zhou kai	sneakers2013@gmail.com linjian891022@gmail.com sneakers2013@gmail.com linjian891022@gmail.com nikesneakersaler@gmail.com nikesneakersaler@gmail.com sneakers2013@gmail.com nianhua.t@gmail.com sneakers2013@gmail.com nianhua.t@gmail.com sneakers2013@gmail.com nianhua.t@gmail.com sneakers2013@gmail.com nianhua.t@gmail.com sneakers2013@gmail.com s	Nike Nike Nike Nike Nike Nike Nike Nike
406 407 408 408 410 411 412 413 414 417 411 411 412	www max-2013 com www.jordan11bredbox.com www.jordan11bredbox.com www.jordan11bredbox.com www.jordan11bredbox.com www.jordan11bredbox.com www.jordan11com www.offerjordan4com www.offerjordan4com www.new2013airmax.com www.new2013airmax.com www.womensjordan3.com www.womensjordan3.com www.highdunkshoes.com Domain.Name www.billigenikefrees.com www.cheapsfoamposite.com	Join Lin Join Lin Peur Junck Nian Hua Nian Hua Nian Hua Nian Hua Nian Hua Fanskel Lemuel Join Lin Fanskel Lemuel shinsaku Drock DEFENDANTS - GR Name(s) zhou kai zhou kai	sneakers2013@gmail.com linjian891022@gmail.com sneakers2013@gmail.com linjian891022@gmail.com nikesneakersaler@gmail.com nikesneakersaler@gmail.com nikesneakersaler@gmail.com nianhua.t@gmail.com sneakers2013@gmail.com	Nike Nike Nike Nike Nike Nike Nike Nike

422	www.cheapslebron10.com	gao wei	1939762843@qq.com	Nike
			Nikefair@msn.com	
423	www.lebron10cheaps.com	CHEN YU	1939762843@qq.com	Nike
			Nikefair@msn.com	_
424	www.cheaplebron10x.com	zhou kai	bestfreeruns@hotmail.com	Nike
			Nikefair@msn.com	
425	www.bestlebronshoes.com	zhou kai	bestfreeruns@hotmail.com	Nike
			Nikefair@msn.com	
426	www.cheaplebron10shoe.com	CHEN YU	1939762843@qq.com	Nike
		<u> </u>	Nikefair@msn com	
427	www salecheapnikes com	zhou kar	bestfreeruns@hotmail.com	Nike
	_		Nikefair@msn.com	
428	www nikefoampositecheap net	zhou kar	bestfreeruns@hotmail.com	Nike
			Nikefair@msn.com	
429	www gofreeruns com	zhou kai	bestfreeruns@hotmail.com	Nike
			Nikefair@msn.com	
		DEFENDANTS	S - GROUP Y	
	Domain Name	Name(s)	Email Address(es)	Affected Plaintiff
				(Nike and/or Converse)
430	www hotairjordan13 com	emmeli duhaime	emmeliduhaime3502@hotmail.com	Nike
			hotairjordan 13@gmail.com	
431	www hotairjordanretro com	emmeli duhaime	emmeliduhaime3502@hotmail.com	Nike
			hotairjordanretro@gmail.com	
432	www.jordanretrostation.com	emmeli duhaime	emmeliduhaime3502@hotmail.com	Nike
			jordanretrostation@gmail.com	
		DEFENDANTS	S - GROUP Z	
	Domain Name	Name(s)	Email Address(es)	Affected Plaintiff
				(Nike and/or Converse)
433	www.cheapnike-trainersuk.co.uk	shunbaoyi,ltd	petershantiver@gmail.com	Nike
434	www cheapukniketrainer co uk	shunbaoy i, ltd	petershanfive@gmail.com	Nike
435	www cheapuk-niketrainers co uk	shunbaoyi, ltd	petershanfive@gmail.com	Nike
		Shan Peter		i
436	www ukcheapnike-trainers co uk	shunbaoyi,ltd	petershanfive@gmail.com	Nike
427	www cheapuknike-trainer co uk	shunbaoyi,ltd	petershanfive@gmail.com	Nike

ATTACHMENT 2 (INFRINGING DOMAIN NAMES)

DEFENDANTS - GROUP A
<u>Domain Names</u>
www.nike678.com
www.cheapnikeaustralia.info
www.niketnshoes.info
www.cheapnikefreeshoes.info
www.wholesalenikeshoes.info
www.nikeskosalg.info
www.nikefrees-au.com
www.airjordanparcher.info
www.cheapnike2013.info
www.cheapnikenflelitejerseys.info
www.cheapnikefreerunning.org
www.cheapnikefreerun2.org
www.newnikefreerun.org
www.nikefreeserials.org
www.cheapniketn.info
www.cheapnikeusa.info
www.nikerequinpascher.info
www.shoesnikeairmax90.info
www.cheaplebronshoes.info
www.lstairmaxshoes.com
www.cheapairmaxshoessales.co.nz
www.airmaxsneakersale.co.uk
DEFENDANTS - GROUP B
Domain Names
www.nikenfldepot.com
DEFENDANTS - GROUP C
Domain Names
www.nike-firm.com
www.airmaxcentral.com
www.nikeairforce1wholesale.com
www.niketncentral.com
www.airforceonediscount.com
www.airforceonesdiscount.com
www.airjordansshoesdiscount.com
www.airjordansshoesnike2013.com
www.airjordansweb.com
www.airmaxpascher.com
www.jordanaimike2013.com
www.jordanairwholesale.com
www.nikeairjordansweb.com
www.nikeairjordanswholesale.com

38	www.nikeairmax1998.com
39	www.nike-air-max-destock.com
40	www.nikeairmaxinstock.com
41	www.nikecentral.com
42	www.nikegrossiste.com
43	www.nike-offer.com
44	www.nikeofusa.com
45	www.nike-pas-cher.fr
46	www.nikerequinpascher.com
47	www.nikeshoxdestock1.com
48	www.nikeshoxgrossiste.com
49	www.nikeshoxweb.com
50	www.nike-sport.com
51	www.niketn.fr
52	www.nike-tn-best.com
53	www.niketngrossiste.com
54	www.nike-tn-instock.com
55	www.nike-tn-sell-discount.com
56	www.nike-trading.com
57	www.retrojordannike2013.com
58	www.retrojordanswholesale.com
59	www.shoxniker4sale.com
60	www.nikeairmaxstore.nl
61	www.nike-requin-nike.com
	DEFENDANTS - GROUP D
	<u>Domain Names</u>
62	www.nikemercurialvaporspeed.com
63	www.nikemercurialsoccer.com
64	www.nikemercurialvapor8sale.com
65	www.nikemercurialvapor8cleats.com
66	www.nikemercurialvapor-ix.com
67	www.nikesocceruk.com
68	www.nikesocceruk.net
69	www.nikemercurialorange.com
70	www.nikemercurialvapor-9.com
71	www.nikeshox.fr
	DEVEND AND COOLS
1	DEFENDANTS - GROUP E
72	<u>Domain Names</u> www.airjordansalg.dk
$\frac{72}{73}$	www.airjordansaig.dk www.aflshox.com
74	www.airmaxonline.dk
75	www.airmaxkaufen.de
76	www.airmaxkadien.de
77	www.airmaxonline.de
1 /	WWW.ditting.co

78	www.airflshox.com
79	www.bestbuynike.com
17	Jwww.bestodyllike.com
	DEFENDANTS - GROUP G
	Domain Names
80	www.nikefree4s.com
	DEFENDANTS - GROUP H
	<u>Domain Names</u>
81	www.cheapnikefreerun30au.com
82	www.nikefreeruns30.com
83	www.nikefreerunnersshoes.com
84	www.newnfljerseys2012nike.com
85	www.nikefreerunners5.com
86	www.nikefreerundkp.com
87	www.nikefreerundku.com
	DEFENDANTS - GROUP J
	Domain Names
88	www.nike-sandals.com
89	www.jordan2013.org
90	www.cheapjordanss.org
91	www.jordanforsales.org
92	www.jordanshoes-usa.com
93	www.airjordanforsale.org
94	www.airjordanscheap.org
95	www.jordansforsalecheap.org
	DEFENDANTS - GROUP M
	Domain Names
96	www.nikefreerunsfactory.com
97	www.nikefreeruns-factory.com
71	www.minchectung-factory.com
	DEFENDANTS - GROUP O
	Domain Names
98	www.cheapnikeairmaxii.com
99	www.cheapnikeairmax-mart.com
	DEFENDANTS - GROUP P
	<u>Domain Names</u>
100	www.airmaxstoreonline.co.uk
101	www.airmaxstoreuk.co.uk
102	www.airmaxofficialshop.co.uk
103	www.airmax2013ukshop.co.uk
104	www.airmax90uksales.co.uk

	DEFENDANTS - GROUP R		
	<u>Domain Names</u>		
105	www.nikeairmaxcheapsale.co.uk		
106	www.nikeairmaxcheapsales.co.uk		
	DEFENDANTS - GROUP S		
	<u>Domain Names</u>		
107	www.cheapnikejerseysdeal.us		
108	www.nflnikejerseysdeal.com		
109	www.nikejerseysfreeshipping.com		
	DEFENDANTS - GROUP T		
	Domain Names		
110	www.buyjordanscheaponline.com		
111	www.buyjordansforcheaponline.com		
112	www.buyrealcheapjordans.com		
113	www.buyretrojordansforsale.com		
114	www.cheapjordansbuynow.com		
115	www.cheapsauthenticjordans.com		
116	www.cheapsjordanoutlet.com		
117	www.jordansonlinestorecheap.com		
118	www.onlinebuyairjordans.com		
119	www.jordanretroshoesinthebox.com		
120	www.thejordan4s.com		
	DEFENDANTS - GROUP U		
121	Www.authentic-jordans.us		
121	www.cheapjordanllbred.org		
122	www.cheapjordanriored.org		
	DEFENDANTS - GROUP W		
	Domain Names		
123	www.airmax2013box.com		
124	www.airmaxhyperfuse2013.com		
125	www.jordanshoesinthebox.com		
126	www.new2013airmax.com		
	DEFENDANTS - GROUP X		
<u> </u>	Domain Names		
127	www.billigenikefrees.com		
128	www.cheapnikelebrons.com		
129	www.salecheapnikes.com www.nikefoampositecheap.net		
130	www.mkeroamposheeneap.net		
-	DEFENDANTS - GROUP Y		
	Domain Names		
L			

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131	www.hotairjordan13.com			
132	www.hotairjordanretro.com			
133	www.jordanretrostation.com			
	DEFENDANTS - GROUP Z			
	<u>Domain Names</u>			
134	www.cheapnike-trainersuk.co.uk			
135	www.cheapukniketrainer.co.uk			
136	www.cheapuk-niketrainers.co.uk			
137	www.ukcheapnike-trainers.co.uk			
138	www.cheapuknike-trainer.co.uk			

ATTACHMENT 3 (DEFENDANTS' EMAIL ADDRESSES)

EMAIL ADDRESSES

	Email Addresses Associated with Defendants	
	1197084292@qq.com	
2	1309624870@qq.com	
3	13-61787-CIV-COHN@safenames.net	
4	1749080296@qq.com	
5	1783149795@qq.com	
6	1939762843@qq.com	
7	2428675043@qq.com	
8	254740383@qq.com	
9	26ab35ff8d45450485db74c6be03207b.protect@whoisguard.com	
10	2684455499@qq.com	
11	278600f2ac8e4d4daeaba50f35ca72cd.protect@whoisguard.com	
12	2807980168@qq.com	
13	2cfe98bec6a34b9c8fb69dfd14e1b062.protect@whoisguard.com	
14	42fc309df34949699049e4dbd8fd1cff.protect@whoisguard.com	
15	445241672@qq.com	
16	474b30d2be1747f3aaffd4b9ee7c4ff9.protect@whoisguard.com	
17	505175638@qq.com	
18	522cf60537bakydg@5225b4d0pi3627q9.privatewhois.net	
19	530267919@qq.com	
20	80338781@qq.com	
21	805800638@qq.com	
22	906856729@qq.com	
23	a88040fc30d747dd928f8bbe33728597.protect@whoisguard.com	
24	a8e81297c8b648519e725355fd361b7c.protect@whoisguard.com	
25	abuse@bizcn.com	
26	acb0570936eb4fe79c92833d24661196.protect@whoisguard.com	
27	accountlocked@godaddy.com	
28	airmax-shop@hotmail.com	
29	airygirl2003@163.com	
30	airygirl2004@126.com	
31	airygirl2004@163.com	
32	allenseng@hotmail.com	
33	amparochandler878@hotmail.com	
34	answer.online7@gmail.com	
35	asklines@hotmail.com	
36	bangd@bangd.com	
37	bbbpppkkk@yahoo.com	
38	beipeng5@163.com	
39	beoltrade@hotmail.com	
40	bestfreeruns@hotmail.com	
41	butshopping@hotmail.com	
42	buykicksonline@hotmail.com	

43	callyhubil@yahoo.com
44	cheapfreetnau@gmail.com
45	vvipwholesale2012@yahoo.com.cn
46	cheapmaxshox@hotmail.com
47	colepenam@gmail.com
48	contact@privacyprotect.org
49	convenienceservice@gmail.com
50	csdffhdhr@hotmail.com
51	csj527581746@163.com
52	customerservice.LY@gmail.com
53	customerservice.OE@gmail.com
54	customerserviceNo1@hotmail.com
55	customersupports@live.com
56	dadicup22@hotmail.com
57	daijiawu@live.com
58	damabaiyun@gmail.com
59	dfiu20@yahoo.com
60	dfse0@yahoo.com
61	diytradecenter@live.com
62	domainadm@hichina.com
63	domainages@gmail.com
64	doradvca@hotmail.com
65	douguaiaidegus@gmail.com
66	efashion2000@gmail.com
67	eloipoole@clough.com.au
68	eloise@clough.com.au
69	emmeliduhaime3502@hotmail.com
70	esoccerpro@gmail.com
71	ewefsdsafds@yahoo.com
72	f3du20@yahoo.com
73	f8c712b99d0946289411fa53c228e246.protect@whoisguard.com
74	fcvfsde0@yahoo.com
75	fdsgfdgd@qq.com
76	ffea0938d62041fe92081af3e5916d71.protect@whoisguard.com
77	funyba@126.com
78	generalmanageridr@hotmail.com
79	gilmercbqwwf@hotmail.com
80	good-2@foxmail.com
81	guanbushangd@gmail.com
82	gucci591@yahoo.com.tw
83	gzicnet@qq.com
84	haifatradestore@gmail.com
85	hi.pickbuys@hotmail.com
86	honestysale2@hotmail.com
87	hopelady2003@163.com

	T
88	hopelady2005@126.com
89	hotairjordan l 3@gmail.com
90	hotairjordanretro@gmail.com
91	hxtradesaler6@163.com
92	idjerseys@gmail.com
93	inttopshop@hotmail.com
94	inttopshop@yahoo.cn
95	inttopshop1@hotmail.com
96	j3e42d@outlook.com
97	janeh910@gmail.com
98	janespinach@hotmail.com
99	jenney@gmail.com
100	jenneyzhenlin@gmail.com
101	jenneyzhenlin@gmail.com)
102	jerseys@goxshop.com
103	jerseys@hotmail.com
104	jerseys@yahoo.com
105	Jerseys8899@hotmail.com
106	jiasw@hotmail.com
107	jiessie@vip.qq.com
108	jnfszsw@163.com
109	johnhijack@139.com
110	johnpeir@163.com
111	jordanretrostation@gmail.com
112	kickslion.com@domainbyproxy.com
113	klbdvdfldfvs@yahoo.com
114	kundeservice@ostyler.com
115	kweg63403@163.com
116	lastdifferent@yahoo.com
117	lastpassward@yahoo.com
118	lawandaescobar894@hotmail.com
119	lessspam42@gmail.com
120	lieann.mccarthy@btinternet.com
121	lihaidao2002@163.com
122	limei53@hotmail.com
123	linda.ch26@hotmail.com
124	lindajerseys@gmail.com
125	linjian891022@gmail.com
126	lmany01@gmail.com
127	lowjerseys@hotmail.com
128	luyuquan3v@163.com
129	lyleqet@hotmail.com
130	madgemail18@yahoo.com
131	makemoney.888@hotmail.com
132	malikwwf@hotmail.com

133	marlorenzo@gmail.com
134	meyerjpat@hotmail.com
135	mgboa0213@gmail.com
136	my.domain@foxmail.com
137	nianhua.t@gmail.com
138	niceamas@gmail.com
139	nightbeforen@yahoo.com
140	nike88888com@hotmail.com
141	nike9a@yahoo.cn
142	nikeairmaxcheapsale@gmail.com
143	nikeairmaxcheapsales.co.uk@gmail.com
144	nikefair@msn.com
145	nikefreeonline2012@hotmail.com
146	nikemercurialorange@gmail.com
147	nikesneakersaler@gmail.com
148	nikesportjerseys@msn.com
149	ninetytradestore@gmail.com
150	ningtie@yahoo.com
151	nugah4u@gmail.com
152	onlinebizdiscount@gmail.com
153	onlinesales21@hotmail.com
154	ordermanageridr@gmail.com
155	paypa999@139.com
156	paypal888999@139.com
157	perchas@126.com
158	phillip@hotmail.com
159	placeanorder@live.com
160	ptcsn@163.com
161	Reactivation-Pending@enom.com
162	repossesseddomain@godaddy.com
163	roro3314@hotmail.com
164	roynaba20@gmail.com
165	rqb@dingdian.cn
166	sale@airmax2013box.com
167	sale@servicesaler.com
168	salesdispute@hotmail.com
169	sdertxd6@163.com
170	sdsar@yahoo.com
171	secureonlinepay@hotmail.com
172	sellmanageridb@hotmail.com
173	sellmanageridr@hotmail.com
174	sellmanageridw@hotmail.com
175	sell-topbrand@hotmail.com
176	service@airjordan2013.co.uk
177	service@cheaplebrons.org

170	In a wind (A) also a milks from your 20 ay mare
178	service@cheapnikefreerun30au.com
179	service@cheapvip-jerseys.com
180	service@dvjerseys.com
181	service@kickslion.com
182	service@kobe8s.org
183	service@nbashoes.com
184	service@nbashoes.net
185	service@newnfljerseys2012nike.com
186	service@nikefreerunners5.com
187	service@nikefreerunnersshoes.com
188	service@nikefreeruns30.com
189	service@saleservice.com
190	service@shoes2u.co.nz
191	service l@airemail.net
192	service1@webseemial.com
193	service2@airemail.net
194	service2@emailkoca.com
195	service2@webseemial.com
196	service3@emailkoca.com
197	service3@linkonlinemail.com
198	service3@storelinkmail.com
199	service3@webseemial.com
200	service5@storelinkmail.com
201	service5@webseemial.com
202	servicemaxairjordan@gmail.com
203	servicesportjerseys@gmail.com
204	shellycorall@yahoo.com
205	shentaishanglk@gmail.com
206	shinsakuonline@hotmail.com
207	shoesale88@hotmail.com
208	shoescapsxyz.com@gmail.com
209	shoesspring@hotmail.com
210	shoesspring2003@hotmail.com
211	shoesspring2005@hotmail.com
212	shopping112233@hotmail.com
213	shopping112233@yahoo.com.tw
214	shopping8090@hotmail.com
215	shopping8090@yahoo.cn
216	shopping8090@yahoo.com.tw
217	sinianz@yahoo.com
218	sneakers2013@gmail.com
219	soccermallonline.org@privacy.above.com
220	sophieyuan3448@sina.com
221	sophieyuan3448@yahoo.com.cn
222	storeonlineservice2012@gmail.com

223	support@domainname.vg
224	
	support@tongyong.net tarastone828@hotmail.com
225	4
226	tebiedeaigei@gmail.com
227	terrycn@live.cn
228	tianjinglos@163.com
229	today0212@gmail.com
230	toddamira883@gmail.com
231	tomjayjay1986@gmail.com
232	topbrand-ol@hotmail.com
233	toplinwei@yahoo.cn
234	tradingspring@hotmail.com
235	jerseysxyz@hotmail.com
236	seiltopbrand@yahoo.cn
237	underjerseys@gmail.com
238	underjerseys-anndi@hotmail.com
239	Valdiviacaa@gmail.com
240	vidda2771@hotmail.fr
241	violet.min@hotmail.com
242	wellsource86@yahoo.com
243	whjsoft@126.com
244	wholesalechinacenter@hotmail.com
245	wholesalegreatjerseys@gmail.com
246	wholesalejerseyscenter@gmail.com
247	wholesalejerseyscenter@yahoo.com
248	wholesalejerseysx@hotmail.com
249	wholesalejersyes@yahoo.com
250	wholesalenfljerseyssale@hotmail.com
251	wholesaleshoestrade@hotmail.com
252	wholesaleshoppingonline@gmail.com
253	wholesale-square@hotmail.com
254	wiles@35zh.com
255	winwindshoes.ca@gmail.com
256	wo gan ni mama@yeah.net
257	www51nikecom@yahoo.cn
258	xerophytea@yahoo.com
259	xerophytec@yahoo.com
260	xerophytem@yahoo.com
261	xia2781233@hotmaill.com
262	xiezhong77@hotmail.com
263	xingdian5g@163.com
264	yahua53@hotmail.com
265	yangziss@hotmail.com
266	yanuolv@yahoo.com.tw
267	yanuolv2013@163.com

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268	yeu050806@hotmail.com
269	yixia3@gmail.com
270	yong2012li@163.com
271	yuhua53@hotmail.com
272	zhihong1888@hotmail.com
273	ziqiang53@163.com
274	support@airmaxsale24.com
275	airmaxsale24@gmail.com

ATTACHMENT 4 (DISCOVERY REQUESTS TO DEFENDANTS)

Robert L. Weigel (RW 0163) Howard S. Hogan (HH 7995) Jennifer C. Halter (JH 7032) Jana N. Checa Chong (JC 1804) GIBSON, DUNN & CRUTCHER, LLP 200 Park Avenue, 47th Floor New York, New York 10166 (212) 351-4000

Attorneys for Plaintiffs NIKE, Inc. and Converse Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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NIKE, INC. and CONVERSE INC.,

Plaintiffs,

٧.

MARIA WU, d/b/a WWW.SHOECAPSXYZ.COM; LINHAI KE d/b/a WWW.SHOECAPSXYZ.COM; STOREONLINESERVICE2012@GMAIL.COM d/b/a WWW.FREERUNONLOCKER.CO.UK; SERVICE2@AIREMAIL.NET d/b/a WWW.FOOTWEARSUPER.CO.UK; LIN ZOE d/b/a WWW.WHOLESALENFLJERSEYSSALE.COM; COMMINUTETE MORE K.K. d/b/a WWW.WHOLESALENFLJERSEYSSALE.COM; BRAKEHEMALT K.K. d/b/a WWW.NFLOFCHINA.COM; et al.

: 2013 Civ. 8012

Defendants.

PLAINTIFFS' FIRST REQUEST TO DEFENDANTS FOR DISCOVERY AND INSPECTION OF DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Rules 26.1 to 26.3 of the Local Civil Rules of the United States District Court for the Southern District of New York, Plaintiffs NIKE, Inc. and Converse Inc. (collectively, "Plaintiffs") by their undersigned attorneys, Gibson, Dunn & Crutcher, LLP, hereby request that Defendants produce the following documents and things for inspection and copying at the offices

of Gibson, Dunn & Crutcher LLP, 200 Park Avenue, 47th Floor, New York, New York 10166, within the shorter of: (a) thirty (30) days; or (b) any timeframe or deadline that may be set by the Court in connection with any Order to Show Cause that may issue in this action.

DEFINITIONS

The following definitions apply to each of the Requests herein and should be read and referred to upon answering the Requests:

- 1. The term "Plaintiffs" means NIKE, Inc. and Converse Inc., and their respective "officers, directors, employees, partners, corporate parent, subsidiaries or affiliates." S.D.N.Y. Local Civil Rule 26.3(c)(5).
- 2. The term "**Defendants**" means refers to the individuals and entities listed in Exhibit 1 to the Complaint¹ and their "officers, directors, employees, partners, corporate parent, subsidiaries or affiliates." S.D.N.Y. Local Civil Rule 26.3(c)(5).

[Footnote continued on next page]

Defendants" refers to the individuals and entities listed in Exhibit 1 to the Complaint, including Maria Wu d/b/a www.shoecapsxyz.com; Linhai Ke d/b/a www.shoecapsxyz.com; storeonlineservice2012@gmail.com d/b/a www.freerunonlocker.co.uk; service2@airemail.net d/b/a www.footwearsuper.co.uk; Lin Zoe d/b/a www.wholesalenfljerseyssale.com; Comminutete More K.K. d/b/a www.wholesalenfljerseyssale.com; Brakehemalt K.K. d/b/a www.nflofchina.com and www.storeonlineselllnow.com; customerserviceNo1@hotmail.com d/b/a www.dsmrecap.com; secureonlinepay@hotmail.com d/b/a www.soccerumarket.com; service3@linkonlinemail.com d/b/a www.d3classicshoes.co.nz; service1@webseemial.com d/b/a www.aflshox.com; Bodon Trading d/b/a www.cheapkd5shoes.com and www.freesrunsstore.com; Eric Lee d/b/a www.cheapkd5shoes.com; Meijin Huang d/b/a www.cheapkd5shoes.com; Zhizhen Li d/b/a www.freesrunsstore.com; Cheap Nike Free Run Trade Co. Ltd. d/b/a www.nikefree4s.com; service@nikefreeruns30.com d/b/a www.nikefreeruns30.com; nikefreeonline2012@hotmail.com d/b/a www.freebuyshoes.com and www.newfreeshoes.com; Chen Jinxing d/b/a www.buvwikionline.com; lindajerseys@gmail.com d/b/a www.lindajerseys.com and www.linda-jerseys.com; University Jhug Limited d/b/a www.yes-shoe.com and www.yes-shoe.net; Zheng Jiangyang d/b/a www.great-wholesalejersyes.net; Extentbargain K.K. d/b/a www.for-jerseys.biz and www.myspeto.com; bbbpppkkk@yahoo.com d/b/a www.nikefreeruns-factory.com; Bi Ning Zhuo d/b/a www.freerunlinea.com; Jiang Lili d/b/a www.cheapnikeairmax-mart.com;

- 3. The term "Plaintiffs' Marks" means trademarks, service marks, and trade dress that identify Plaintiffs, their products, authorized stores, websites, and affiliates, including but not limited to the marks referenced in the Complaint in this action.
- 4. The term "Disputed Products" means any and all products sold, manufactured, marketed or otherwise offered to consumers by any of the Defendants that in any way display, utilize or reference any of Plaintiffs' Marks or any colorable imitations of Plaintiffs' Marks, including but not limited to the products defined in the Complaint in this action as "Counterfeit Products."
- 5. The terms "Person" and "Persons" mean any natural person or any business, legal or governmental entity or association. S.D.N.Y. Local Civil Rule 26.3(c)(6).
- 6. The term "**Document**" is synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term. S.D.N.Y. Local Civil Rule 26.3(c)(2).
- 7. The term "Communication" means "the transmittal of information (in the form of facts, ideas, inquiries, or otherwise)." S.D.N.Y. Local Civil Rule 26.3(c)(1).

customerservice.LY@gmail.com d/b/a www.airmaxofficialshop.co.uk and www.airmax90uksales.co.uk; service@kickslion.com d/b/a www.kickslion.net; Kendrickvery PT d/b/a www.oykununsesi.com and www.payfororder.com; wholesalejerseyscenter@gmail.com d/b/a www.nfljerseyswebsite.com; Meion Online Store d/b/a www.buyrealcheapjordans.com and www.fashionpay.com; lessspam42@gmail.com d/b/a www.authentic-jordans.us; Jinhui Zheng d/b/a www.shopuq.com; Zheng Jinzhao d/b/a www.shopuq.com; sneakers2013@gmail.com d/b/a www.max-2013.com; nikefair@msn.com d/b/a www.cheapestlebron10.com; hotairjordan13@gmail.com d/b/a www.hotairjordan13.com; Shan Peter d/b/a www.cheapuk-niketrainers.co.uk; ABC Companies 1-100; and John Does 1-100.

[[]Footnote continued from previous page]

8. The term "Concerning" means "relating to, referring to, describing, evidencing or constituting." S.D.N.Y. Local Civil Rule 26.3(c)(7).

INSTRUCTIONS

- A. In producing documents pursuant to these requests, Defendants are required to furnish all Documents in Defendants' possession, custody or control that are known or available to Defendants. A Document is in Defendants' possession, custody or control, if, among other things, it is in Defendants' physical custody, or if it is in the physical custody of any other person and Defendants (a) own such Document in whole or in part; (b) have a right by contract, statute, or otherwise to use, inspect, examine or copy such Document on any terms; (c) have an understanding, express or implied, that Defendants may use, inspect, examine or copy such Document on any terms; or (d) have, as a practical matter, been able to use, inspect, examine or copy such Document when Defendants have sought to do so. Such Documents shall include, without limitation, Documents that are in the custody of Defendants' attorney(s) or other agent(s).
- B. Defendants must make a diligent search of Defendants' records (including but not limited to paper records, computerized records, electronic mail records and voice-mail records) and of other papers and materials in Defendants' possession or available to Defendants or Defendants' attorneys, financial advisors, consultants, investigators, and other agents or representatives.
- C. Each request herein constitutes a request for Documents in their entirety, with all enclosures and attachments, and without abbreviation, redaction or expurgation.
- D. Defendants shall produce any and all drafts and copies of each Document that are responsive to any request, and all copies of such Documents that are not identical in any respect,

including but not limited to copies containing handwritten notes, markings, stamps or interlineations.

- E. If Defendants contend that a requested Document is privileged in whole or part, or contend that any identified Document would be excludable from production and discovery regardless of its relevance (including, but not limited to, a claim of attorney-client privilege or the attorney work-product doctrine), Defendants are required, for each and every such Document, to state the nature of the privilege being claimed and to provide the following information: (a) the type of document, e.g., letter or memorandum; (b) the general subject matter of the document; (c) the date of the document; and (d) such other information as is sufficient to identify the document for a subpoena *duces tecum*, including, where appropriate, the author of the document, the addressees of the document, and any other recipients shown in the document, and, where not apparent, the relationship of the author, addressees, and recipients to each other.

 S.D.N.Y. Local Civil Rule 26.2(a).
- F. A request for Documents within a particular time period shall be deemed to include all Documents that were dated, prepared, sent or received during that time period.
- G. If Defendants possess, control, or have custody of nothing responsive to any numbered request set forth below, state this fact by so specifying in Defendants' response to said request.
- H. If Defendants' "original" of a Document is a photocopy (or other copy), then the copy should be produced as the original.
- I. Documents shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the particular request or requests to which they are responsive. Wherever requested Documents, are stored in electronic, digital, or

computerized form, Defendants are to provide it in that form, including any software required to access, retrieve, or read the data. All other Documents should be produced in a readable electronic format whenever and wherever possible.

- J. With respect to the production of any category of Documents which Defendants contend is in some way burdensome or oppressive, state the specific reason for this objection and briefly summarize the Documents in question.
- K. Each request shall be deemed continuing so as to require supplementation if

 Defendants obtain any further responsive Documents between the time that Defendants' initial production is due and the time of trial.

II. Documents Requested

- a. All Documents Concerning Plaintiffs in Defendants' possession, custody or control.
- b. All Documents Concerning all Defendants' uses of the Plaintiffs' Marks or colorable imitations thereof, including but not limited to all such uses on advertisements, websites, products of any type, signs, prints, packages, wrappers, pouches, receptacles, metadata, search engine keywords, advertising matter, promotional, and other materials.
- c. All Documents Concerning any and all earnings, profits, or other benefits that Defendants have obtained that are in any way attributable, related, or connected to Defendants' uses of Plaintiffs' Marks, including but not limited to the names and account numbers for the banks, savings and loans, and other financial institutions in which such earnings, profits, or other benefits are maintained.
- d. All Documents Concerning Defendants' manufacture, purchase, acquisition, design, order, import, export, advertisement, distribution or sale of the Disputed Products, including but not limited to Documents Concerning Defendants' sources of the Disputed Products, and any pending advertisements, offerings, sales, or shipments of the Disputed Products.
- e. All Documents Concerning the relationship between the Defendants, including but not limited to documents concerning the corporate structure and organization of the Defendants and the transfer of payments, profits, costs, and/or losses between them.
- f. All Documents Concerning any and all payments to Defendants in return for any and all Disputed Goods that were transmitted, processed, facilitated, enabled, or otherwise contributed to by any and all third parties, including but not limited to credit card companies.

agencies, or processors, or other financial institutions or such as, without limitation:

- (1) PayPal; (2) MasterCard, Visa, American Express, and/or Discover; (3) Bank of China;
- (4) Western Union; (5) MoneyGram (6) Payitrust Co., Ltd.; (7) Realpay; (8) Moneybrace;
- (9) Vimapay Co., Ltd.; (10) Pmnorth; (11) Promptlypayments; (12) Wedopay; (13) ECPSS; and (14) GlbPay; and (15) any and all accounts with any and all financial institutions responsible for processing credit or debit card purchases from any of Defendants.
- g. All Documents Concerning, relating to, supporting, or contradicting any of the allegations in the Complaint in this action.

Dated: New York, New York November ___, 2013

GIBSON, DUNN & CRUTCHER LLP

By:_____

Robert L. Weigel (RW 0163) Howard S. Hogan (HH 7995) Jennifer C. Halter (JH 7032)

Jana N. Checa Chong (JC 1804)

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